

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

KAYLA ROBINSON,)	
)	
Plaintiff,)	
)	Case No. 4:17-cv-00156-PLC
v.)	
)	
ST. LOUIS BOARD OF POLICE)	
COMMISSIONERS, et al.,)	
)	
Defendants.)	

PLAINTIFF’S PROPOSED EXHIBIT LIST

I. The Plaintiff will offer into evidence the following Exhibits:

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| Plaintiff’s Exhibit 1: | RSMo. § 544.193 (Missouri Statute entitled “Strip searches prohibited, when—how executed if authorized”) |
| Plaintiff’s Exhibit 2: | St. Louis Metropolitan Police Department’s Explanation of IAD Final Dispositions |
| Plaintiff’s Exhibit 4: | St. Louis Metropolitan Police Department’s Special Order 1-01 (“USE OF FORCE”) |
| Plaintiff’s Exhibit 6: | St. Louis Metropolitan Police Department’s Special Order 6-02 (“COMPLAINT/DISCIPLINE PROCEDURES”) |
| Plaintiff’s Exhibit 7: | St. Louis Metropolitan Police Department’s Special Order 7-01 (“TRAFFIC PROCEDURES”) |
| Plaintiff’s Exhibit 8: | St. Louis Metropolitan Police Department’s Special Order 8-02 (“STOP & FRISK, SEARCHES WITH AND WITHOUT WARRANTS”) |
| Plaintiff’s Exhibit 13: | Plaintiff’s SSM Health Depaul St Louis Medical Records |
| Plaintiff’s Exhibit 15: | Plaintiff’s October 19-20, 2012 Statement to the St. Louis Metropolitan Police Department |

- Plaintiff's Exhibit 16:** October 22, 2012 "ALLEGATION OF EMPLOYEE MISCONDUCT REPORT" Regarding Plaintiff's Allegations
- Plaintiff's Exhibit 17:** Sergeant Mark McMurray's January 2, 2013 Statement to IAD Regarding Plaintiff's Allegations
- Plaintiff's Exhibit 18:** Detective Michael Strong's January 23, 2013 Statement to IAD Regarding Plaintiff's Allegations
- Plaintiff's Exhibit 19:** Detective Robert Singh's February 9, 2013 Statement to IAD Regarding Plaintiff's Allegations
- Plaintiff's Exhibit 20:** IAD's August 8, 2013 Findings with Regard to Plaintiff's Allegations
- Plaintiff's Exhibit 21:** St. Louis Metropolitan Police Department's August 26, 2013 Letter to Plaintiff Informing her of the Department's Findings Related to her Allegations
- Plaintiff's Exhibit 22:** August 26, 2013 St. Louis Metropolitan Police Department's "INTRA-DEPARTMENT AND CORRESPONDENCE SHEET" from Lieutenant Colonel Lawrence O'Toole to Captain Gwen Spicer Regarding IAD's Findings with Regard to Plaintiff's Allegations
- Plaintiff's Exhibit 23:** May 28, 2013 Email from Sergeant Mark McMurray to IAD Sergeant Lisa Albright
- Plaintiff's Exhibit 25:** October 20, 2012 Email from Defendant Swinton to Sergeant Mark McMurray Regarding the Stop, Investigation, Search, and Detention of Plaintiff that Occurred on October 19, 2012
- Plaintiff's Exhibit 27:** January 2, 2013 Email from Sergeant Mark McMurray to Lieutenant Kenneth Lammert
- Plaintiff's Exhibit 28:** January 2, 2015 Initial Federal Complaint Against Defendant Swinton
- Plaintiff's Exhibit 29:** September 15, 2015 Second Amended Complaint Against Defendant Swinton

- Plaintiff's Exhibit 31:** October 21, 2015 "Plaintiff's Notice of Acceptance of Offer of Judgment" Related to the Complaint Filed Against Defendant Swinton
- Plaintiff's Exhibit 32:** December 8, 2015 Final "JUDGMENT" Related to the Complaint Filed Against Defendant Swinton
- Plaintiff's Exhibit 33:** Defendant Swinton's July 30, 2013 Response to Questions Presented to her by the St. Louis Metropolitan Police Department as part of her Application for Employment
- Plaintiff's Exhibit 34:** IAD's January 26, 2015 Findings Regarding Defendant Swinton's Violations of St. Louis Metropolitan Police Department Policies
- Plaintiff's Exhibit 35:** Defendant Swinton's April 14, 2015 "CONSENT TO ACCEPT RECOMMENDED DISCIPLINE" Related to her Alleged Violations of St. Louis Metropolitan Police Department Policies
- Plaintiff's Exhibit 36:** Defendant Swinton's April 16, 2015 "NOTIFICATION OF SUSPENSION FROM DUTY" Related to her Alleged Violations of St. Louis Metropolitan Police Department Policies
- Plaintiff's Exhibit 37:** April 21, 2015 "INTRA-DEPARTMENT REPORT AND CORRESPONDENCE SHEET" From Lieutenant Latricia Allen to Lieutenant Colonel O'Toole Regarding Defendant Swinton's IAD Investigation
- Plaintiff's Exhibit 38:** Defendant Hawkin's "Linked In" Profile
- Plaintiff's Exhibit 39:** Satellite Imagery of the Location of Plaintiff's Stop, Detention, Search, and Arrest
- Plaintiff's Exhibit 41:** Satellite Imagery of the Location of Plaintiff's Stop, Detention, Search, and Arrest Containing Witness Markings
- Plaintiff's Exhibit 42:** Photograph 1 of the General Area of the Parking Lot Whereby Plaintiff was Searched on October 19, 2012

- Plaintiff's Exhibit 43:** Photograph 2 of the General Area of the Parking Lot Whereby Plaintiff was Searched on October 19, 2012
- Plaintiff's Exhibit 47:** Photograph of the General Area Where the Vehicle Plaintiff was Occupying on October 19, 2012 was Stopped
- Plaintiff's Exhibit 48:** Photograph 1 of the Condition of a Semi-Truck Trailer in the Parking Lot Where Plaintiff was Searched on October 19, 2012
- Plaintiff's Exhibit 50:** Photograph of the General Area in the Parking Lot Where Plaintiff was Searched on October 19, 2012
- Plaintiff's Exhibit 51:** Photograph 1 Showing Dark Markings Consistent with Grease on the Jacket Plaintiff was Wearing on October 19, 2012
- Plaintiff's Exhibit 52:** Photograph 2 Showing Dark Markings Consistent with Grease on the Jacket Plaintiff was Wearing on October 19, 2012
- Plaintiff's Exhibit 56:** Photograph 1 Showing Dark Markings Consistent with Grease on the Shirt Plaintiff was Wearing on October 19, 2012
- Plaintiff's Exhibit 57:** Photograph 2 Showing Dark Markings Consistent with Grease on the Shirt Plaintiff was Wearing on October 19, 2012
- Plaintiff's Exhibit 58:** Transcript of Ronnell Jenkins' October 31, 2012 Interview with IAD Regarding Plaintiff's Allegations
- Plaintiff's Exhibit 59:** Transcript of Defendant Swinton's December 11, 2012 Interview with IAD Regarding Plaintiff's Allegations
- Plaintiff's Exhibit 60:** Transcript of Plaintiff's October 22, 2012 Interview with IAD Regarding her Allegations
- Plaintiff's Exhibit 61:** Transcript of Defendant Hawkins' December 19, 2012 Interview with IAD Regarding Plaintiff's Allegations
- Plaintiff's Exhibit 64:** Video of Defendant Swinton From April 10, 2014 Stop, Detention, and Arrest of a Motorist Where Defendant Swinton Appears to be Assisting Fellow Officers in Covering up Alleged Police Misconduct
- Plaintiff's Exhibit 65:** Audio Recording of Radio Transmission from October 19, 2012 Related to Plaintiff's Allegations

- Plaintiff's Exhibit 66:** October 19, 2012 Surveillance Video of the Parking Lot Where Plaintiff was Searched
- Plaintiff's Exhibit 67:** Video of Defendant Hawkins' December 19, 2012 Interview with IAD Regarding Plaintiff's Allegations
- Plaintiff's Exhibit 68:** Video of Defendant Swinton's December 11, 2012 Interview with IAD Regarding Plaintiff's Allegations

II. The Plaintiff may offer into evidence the following Exhibits:

- Plaintiff's Exhibit 3:** City of St. Louis "Employee Code of Conduct"
- Plaintiff's Exhibit 5:** St. Louis Metropolitan Police Department's Special Order 1-07 ("MISSION, VALUES, CODES OF ETHICS, AND OATH OF OFFICE")
- Plaintiff's Exhibit 9:** St. Louis Metropolitan Police Department's Special Order 8-03 ("HOLDOVER OPERATIONS")
- Plaintiff's Exhibit 10:** Plaintiff's First Amended Complaint
- Plaintiff's Exhibit 11:** Defendant Hawkins' Answer to Plaintiff's First Amended Complaint
- Plaintiff's Exhibit 12:** Defendant Swinton's Answer to Plaintiff's First Amended Complaint
- Plaintiff's Exhibit 14:** Plaintiff's "MEDICAL SCREENING FORM" dated October 19-20, 2012
- Plaintiff's Exhibit 24:** Defendant Hawkin's October 5, 2005 Response to Questions Presented to her by the St. Louis Metropolitan Police Department as part of her Application for Employment
- Plaintiff's Exhibit 26:** Defendant Hawkins' Work History with the St. Louis Metropolitan Police Department
- Plaintiff's Exhibit 30:** October 21, 2015 "OFFER OF JUDGMENT" Related to the Complaint Filed Against Defendant Swinton
- Plaintiff's Exhibit 40:** Additional Satellite Imagery of the Location of Plaintiff's Stop, Detention, Search, and Arrest

- Plaintiff's Exhibit 44:** Photograph 3 of the General Area of the Parking Lot Whereby Plaintiff was Searched on October 19, 2012
- Plaintiff's Exhibit 45:** Photograph 4 of the General Area of the Parking Lot Whereby Plaintiff was Searched on October 19, 2012
- Plaintiff's Exhibit 46:** Photograph 5 of the General Area of the Parking Lot Where Plaintiff was Searched on October 19, 2012
- Plaintiff's Exhibit 49:** Photograph 2 of the Condition of a Semi-Truck Trailer in the Parking Lot Where Plaintiff was Searched on October 19, 2012
- Plaintiff's Exhibit 53:** Photograph 3 Showing Dark Markings Consistent with Grease on the Jacket Plaintiff was Wearing on October 19, 2012
- Plaintiff's Exhibit 54:** Photograph 4 Showing Dark Markings Consistent with Grease on the Jacket Plaintiff was Wearing on October 19, 2012
- Plaintiff's Exhibit 55:** Photograph 5 Showing Dark Markings Consistent with Grease on the Jacket Plaintiff was Wearing on October 19, 2012
- Plaintiff's Exhibit 62:** Defendant Hawkins' Answers to Plaintiff's First Interrogatories to Defendant Hawkins
- Plaintiff's Exhibit 63:** St. Louis Board of Police Commissioners Answers to Plaintiff's First Interrogatories to St. Louis Board of Police Commissioners

Plaintiff reserves the right to introduce exhibits identified in Plaintiff's exhibit to introduce additional exhibits in response to the evidence presented by Plaintiff at trial.

Respectfully submitted,

HOLLINGSHEAD & DUDLEY

/s/ Benjamin J. Coudret

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned counsel certifies that a true and accurate copy of the foregoing was served upon Robert Isaacson, counsel for Defendants, via the Court's CM/ECF electronic notification system on this 9th day of April, 2018.

/s/ Benjamin J. Coudret